

Ronald M Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA,)
)
)
 v.) Criminal Action No. 20-CR-00433
)
 WILLIAM RODERICK BRYAN,)
 Defendant.)

MOTION FOR *IN CAMERA* INSPECTION

COMES NOW Defendant William Roderick “Roddie” Bryan, by and through undersigned counsel, pursuant to Article I, Section I, Paragraph I, of the Constitution of the State of Georgia and the Fifth, Sixth, and Fourteenth Amendments to the United States Constitution, the decisions in Pennsylvania v. Ritchie, 480 U S 39, 107 S. Ct. 989, 94 L.E. 2d 40 (1987); Ray v. Dept. of Human Resources, 155 Ga App 81, 270 S.E.2d 303 (1980), and the procedures set forth in Davidson v. State, 183 Ga App 557 (1987), and petitions the trial court to subpoena: (1) all probation records of Ahmaud Arbery in the custody and control of the Department of Community Supervision; (2) all medical and mental health records pertaining to Ahmaud Arbery (including but not limited to any and all psychiatric, psychological and substance abuse counseling and treatment records); (3) all records pertaining to Ahmaud Arbery in the custody and control of the Juvenile Court of Glynn County; (4) all records in the custody and control of the Department of Family and Children Services (DFCS) pertaining to Ahmaud Arbery; and (5) all records in the custody and control of the Glynn County Board of Education pertaining to Ahmaud Arbery. Defendant requests that said subpoenas issue so as to facilitate an *in camera* inspection of said records to determine whether disclosure of those records or portions thereof to defense counsel is required for defendant to receive a fair trial.

WHEREFORE, Defendant prays that the Court grant said motion.

So noted, this 16th day of July, 2020.

/s/ Kevin Gough
Kevin Gough
ATTORNEY FOR DEFENDANT
Georgia Bar No. 303210

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CERTIFICATE OF SERVICE

COMES NOW Kevin Gough, attorney for the defendant, and hereby certifies that a copy of the foregoing document(s) have been served upon the District Attorney by email delivery this date.

This 16th day of July, 2020.

/s/ Kevin Gough

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